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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
QWEST CORPORATION	)	
	)	
PETITION FOR PERMISSION TO WITHDRAW ONA SERVICES	)	02-355

PETITION OF QWEST CORPORATION FOR PERMISSION TO WITHDRAW ONA SERVICES

Qwest Corporation ("Qwest") hereby files this request that rhe Federal Communications Commission ("Commission" or "FCC") grant it permission to withdraw three Open Network Architecture ("ONA") services currently listed as Basic Serving Arrangements ("BSA") in its ONA Users Guide and its Annual ONA Report. Qwest also plans to discontinue the offering of a state-tariffed Complementary Network Service (ScanAlert). It is Qwest's opinion that no FCC permission is required for such discontinuance However, if a determination is made that permission is required, Qwest seeks permission to withdraw ScanAlert

I. BASIC SERVING ARRANGEMENTS

As is discussed herein, Qwest plans to discontinue the offering of these services. The requested discontinuance is consistent with the standards enunciated in the *Memorandum Opinion and Order* of the Chief of the (then) Common Carrier Bureau in the case of the GTE Waiver Request[1] and the ONA Withdrawal Orders.[2] It is no longer economically or technically

[1] *In the Matter of Amendments of Part 69 of the Commission's Rules Relating to the Creation of Access Charge Subelements for Open Network Architecture*, 11 FCC Rcd 5558 (Common Carrier Bureau 1995) ("*GTE* Order").

feasible to offer these services and excellent substitutes are available for those services where demand still exists. In addition, Qwest will grandfather existing customers of the withdrawn services who do not wish to order the substitute services.

A. **Dataphone** Select-A-Station

Dataphone Select-a-Station is a private line transport data service designed for use by alarm service providers. The service was developed for applications where a master station and several remote stations exchange voice grade data information DataPhone Select-a-Station was designed to establish point-to-point connections between a master station and a number of remote stations that communicate one at a time, usually in rapid sequence. The service is tariffed in Qwest Corporation Tariff F.C.C.No. 1, Section 7.4.2.A.3. It is described as a BSA in Qwest's September 30, 2002 ONA Users' Guide at Appendix 1, page 6. The service has been offered since prior to April 3, **1984.** To the best of Qwest's knowledge, the DataPhone Select-a-Station is not offered as an ONA service by other Regional Bell Operating Companies ("RBOCs").

Qwest was advised in 1990 by the manufacturer of the equipment **used** for DataPhone Select-a-Station, Western Electric, that the equipment is no longer manufactured for this service, **and** that spare parts for equipment already in place are not available.[3] Qwest has no customers for the service Qwest currently has two services available that are reasonable and ready substitutes for DataPhone Select-a-Station:

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[2] *In the Matter of Amendment of Part 69 of the Commission's Rules Relating to the Creation of Access Charge Subelements for Open Network Architecture; Filing and Review of Open Network Architecture Plans, Memorandum Opinion and Order,* 7 **FCC Rcd. 811** (Common Carrier Bureau 1992); ***Memorandum Opinion and Order on Reconsideration,*** 7 FCC Rcd. **7241** (Common Carrier Bureau 1992).

[3] This fact was reflected in the ONA Users' Guide, Appendix 1, p. 6

- Direct Current Channels This service is described in Qwest's Tariff F.C.C No 1, Section 7, and in the Qwest September 30, 2002 ONA Users' Guide as a BSA (Appendix 1, page 8) It delivers low speed data transport at varying signal rates up to 30 baud with DC continuity to provide customers with alarm service capability between locations within the same Qwest central office.

- McCulloh Loops This service is described in Qwest's federal tariffs (Tariff F.C.C No 1, Section 7) and in Qwest's September 30, 2002 ONA Users' Guide as a BSA, Appendix 1, page 11. It provides alarm signaling that connects up to 26 points from three central offices, using one as a master station and delivering access to remote nations via two additional central offices

B. Digital Data Service 2-Wire (DDS2-Wire)

Two-wire DDS service provides a two-wire, full duplex circuit using a 2B1Q protocol capable of transmitting digital data at 155 Kbps. The service is offered on a point-to-point basis only The service is tariffed in Qwest Corporation Tariff F.C.C.No. 1, Section 7.17.1, and is described as a BSA in Qwest's September 30, 2002 ONA Users' Guide at Appendix 1, page 7. The service has been offered since 1999. The service is not tariffed intrastate.

Qwest has been advised by the manufacturer of the equipment (Integrated Network Corporation) that the manufacturer has discontinued business and that the equipment is no longer manufactured for this service. There are no current customers for the service, nor has Qwest ever had a customer for this service.

C. Qwest JDSL

Qwest IDSL is a data only, two wire DSL private line service. Unlike Qwest's other DSL services, Qwest IDSL service is not capable of sharing a copper loop with traditional telephone service. The service is tariffed in Qwest Corporation Tariff F.C.C. No. 1, Section 8,

and is described as a BSA in Qwest's September 30, 2002 ONA Users' Guide at Appendix 1, page 12. Qwest IDSL service has been offered since 2000.

Qwest initially developed this service as a way to serve large business customers who had workers who needed access to the Internet or to a corporate network from home. The anticipated demand for this service has not materialized and Qwest has not been successful in signing large numbers of these corporate customers. In addition, unlike Qwest's other DSL services, Qwest IDSL service is not capable of sharing a copper loop with the customer's existing telephone service, A dedicated loop is installed as part of the IDSL service, which results in a significantly higher priced product than other DSL offerings (*e.g.*, IDSL is priced at $69.95 for a one-year contract (144 Kbps service) while Qwest's regular ADSL service starts at 821.95 (256 Kbps service))

Qwest will grandfather existing Qwest IDSL customers while trying to move these customers to ISDN or DSL services In addition, the following existing Qwest services are reasonable substitutes for Qwest IDSL services:

- Qwest single line ISDN Service ("SLS") uses the same pair of wires that delivers basic phone service to business or residential customers. SLS provides two high-speed communications channels that can be used simultaneously and independently to carry any combination of data, image video, or voice calls. It consists of a 2B + D configuration for a total transmission rate of 144 Kbps. Each 64 KBPS B channel carries user information such as voice calls, circuit-switched data, or video. The D channel is a 16 Kbps channel with data and signaling functionality. The service is tariffed in Qwest's intrastate tariffs at Section 14 and is described in Qwest's April 15,2002 Annual ONA Report at page 18.

- In some circumstances DSL Service, described in Section 8.4 of Qwest's Tariff F.C.C. No. 1, and in the September 30,2002 ONA User'S Guide at Appendix 1, page 13. This service provides Asynchronous Transfer Mode technology over dedicated transport facilities, Asymmetrical Digital Subscriber Line technology over a Company-provided metallic local loop at a single physical location.

Accordingly, while it is "technically feasible" to continue Qwest IDSL service, it is not a successful product and it is not economically rational for Qwest to continue to offer it. Qwest will grandfather the service for existing customers

II. SCANALERT (COMPLEMENTARY NETWORK SERVICE)

Qwest also plans to discontinue the offering of a state-tariffed Complementary Network Service (ScanAlert) It is Qwest's opinion that no FCC permission is required for such discontinuance. However, if a determination is made that permission is required, Qwest seeks permission to withdraw ScanAlert from its state ONA tariffs.

ScanAlert provides spread spectrum connectivity to enable end users to send alarm signals to alarm companies. It is listed in Qwest's ONA tariffs in all states, and is described in the Qwest ONA Users' Guide at pages 174-175. Customers for the service exist only in Washington and Oregon. End users do not connect to any Qwest-provided enhanced service via ScanAlert. The service is also offered via the Qwest retail tariff in Washington, Oregon and Arizona. Existing customers in Washington and Oregon will be grandfathered, and will be served via Qwest's continuing local exchange non-ONA tariff for the service. Because Complementary Network Services are "locally tariffed, basic services that . . . give end users access to the network for a variety of applications, not merely enhanced service applications[,]"[4] CNS services do not need to be tariffed in Qwest's interstate tariffs. Qwest seeks to remove this service because it is not Network Equipment-Building System ("NEBS) compliant. (NEBS

[4] *In the Matter of Filing and Review of Open Network Architecture Plans, Memorandum Opinion and Order,* 4 FCC Rcd. 1, 47 ¶ 83 (1988); *see In the Matter of Petition for Waivers by Pacific Bell and Nevada Bell of May 21 and June 1, 1996 ONA Services Tariffing Requirements, Computer III Remand Proceedings: BOC Safeguards and Tier 1 LEC Safeguard. Filing and Review of Open Network Architecture Plans, Order,* 11 FCC Rcd. 14338, 14342 (1996).

describes the central office environment including environmental criteria.) The vendor (DXC) is now required by Qwest to make its equipment NEBS compliant 'The vendor is not willing to make the necessary modifications to its equipment, and Qwesr will not add to or expand the equipment.[5]

Qwest currently has two services available that are reasonable and ready substitutes for ScanAlert,

- Direct Current Channels. This service is described in Qwest's Tariff F.C.C.No. 1, Section 7, and in the Qwest September 30, 2002 ONA Users' Guide as a BSA (Appendix 1, page 8). It delivers low speed data transport at varying signal rates up to 30 baud with DC continuity to provide customers with alarm service capability between locations within the same Qwest central office.

- McCulloh Loops. This service is described in Qwest's federal tariffs (Tariff F.C.C.No. 1, Section 7) and in Qwest's September 30,2002 ONA Users' Guide as a BSA, Appendix 1, page 11. It provides alarm signaling that connects up to 26 points from rhree central offices, using one as a master station and delivering access to remote stations via two additional central offices.

III. CONCLUSION

In conclusion, Qwest requests that it be permitted to withdraw the offering of the three ONA BSd services described above, subject to the grandfathering provisions described herein Upon grant of this application, Qwest will make immediate modifications to its interstate tariffs and its ONA Users' Guide to implement the actions described in this application. Information concerning ScanAlert IS provided herein for informational purposes Should FCC permission *to* withdraw ScanAlert be necessary, such permission is hereby requested

[5] For grandfathered customers, Qwest will permit the noncompliant equipment to remain in place until it can move the grandfathered customers to other services.

WHEREFORE, Qwest respectfully requests that the instant application be granted

Respectfully submitted,

QWEST CORPORATION

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October 15, 2002

CERTIFICATE OF SERVICE

I, Stephanie Felsted, do hereby certify on this 15" day of October, 2002, that I have caused an original and four copies of the foregoing PETITION OF QWEST CORPORATION FOR PERMISSION TO WITHDRAW ONA SERVICES to be filed with the Office of the Secretary of the FCC, with one copy sent via e-mail to the following person:

Ann Stevens
Competition Policy Division
Wireline Competition Bureau
Astevens@fcc.gov

Stephanie Felsted

Stephanie Felsted'

(CC88-2y.doc)